

UNITED STATES OF AMERICA :  
VS. : 17-CR-00160  
ELDON STONE ROSS :

**NITZA I. QUINONES ALEJANDRO**  
Judge, United States District Court

John I. McMahon, Jr., Esquire  
McMAHON, McMAHON & LENTZ  
21 West Airy Street  
Norristown, PA 19401  
(610) 272-9502  
Identification No. 53777

ATTORNEY FOR DEFENDANT

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA :  
VS. : 17-CR-00160  
ELDON STONE ROSS :

**DEFENDANT'S MOTION FOR SENTENCING CONTINUANCE**

The defendant, by his attorney, John I. McMahon, Jr., Esquire, respectfully requests a continuance in this matter. In support of this motion, the defense avers as follows:

1. On March 28, 2017, defendant Eldon Stone Ross was charged by Information with one count of Operating an Unlicensed Money Transmitting Business, in violation of 18 U.S.C. § 1960(a).
2. On April 11, 2017, the defendant appeared before the Honorable Nitza I. Quinones Alejandro and pled guilty to Count One of the Information, Operating an Unlicensed Money Transmitting Business, in violation of 18 U.S.C. § 1960(a), pursuant to a written plea agreement.
3. The Court subsequently issued an Order scheduling the Sentencing in this matter for August 9, 2017.
4. The defense requests a sixty (60) day continuance of the Sentencing for the following reason:

(a) Defense counsel is attached for a one (1) week jury trial in the Court of Common Pleas of Montgomery County during the week of August 7, 2017 before the Honorable Garrett D. Page in the case of Commonwealth v. Pacheco. For purposes of rescheduling, defense counsel is also attached to two (2) week jury trial in the Court of Common Pleas of Montgomery County from October 10, 2017 through October 24, 2017 before the Honorable Carolyn T. Carluccio in the case of Venna, et al. v. Metropolitan Properties of America, Inc., et al.

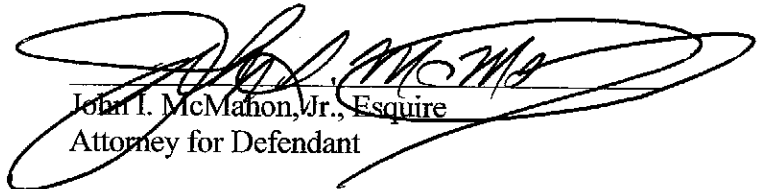
5. The Assistant United States Attorney, Albert Glenn, has no objection to this continuance request.

6. A continuance of this matter will further advance the interests of justice in this matter.

WHEREFORE, the defendant respectfully submits that the Sentencing be continued in this matter for the reason set forth herein.

Respectfully Submitted,

**McMAHON, McMAHON & LENTZ**



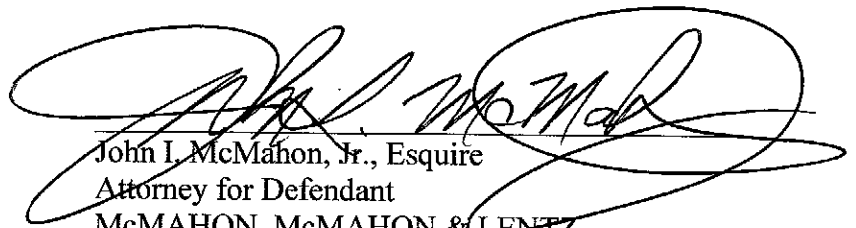
John I. McMahon, Jr., Esquire  
Attorney for Defendant

**CERTIFICATE OF SERVICE**

I, John I. McMahon, Jr., Esquire, certify that the foregoing Motion for Sentencing Continuance was filed electronically on July 31, 2017 and is available for viewing and downloading from the ECF system. The foregoing Motion was served on the following persons by electronic service on July 31, 2017:

Honorable Nitza I. Quinones Alejandro  
8613 U.S. Courthouse  
601 Market Street  
Philadelphia, PA 19106  
(electronic service)

Albert Glenn, Esquire  
Special Assistant United States Attorney  
United States Attorney's Office  
615 Chestnut Street  
Suite 1250  
Philadelphia, PA 19106  
(electronic service)

  
John I. McMahon, Jr., Esquire  
Attorney for Defendant  
McMAHON, McMAHON & LENTZ  
21 West Airy Street  
Norristown, PA 19401